

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13  
ROBERT A. LaROSA :  
Debtor : NO. 19-11386 elf

**NOTICE OF MOTION,  
RESPONSE DEADLINE AND HEARING DATE**

Debtor, Robert A. LaRosa, has filed a Motion to Modify Confirmed Chapter 13 Plan with the Court seeking approval of a modification to the confirmed Chapter 13 Plan.

1. **Your rights may be affected.** You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)
2. **If you do not want the Court to grant the relief sought in the motion** or if you want the court to consider your views on the motion, then on or before **April 12, 2021, you or your attorney must file a response to the Motion.** (*see Instructions on next page*).
3. **A hearing on the motion** is scheduled to be held on **April 27, 2021 at 10:00 a.m. in Courtroom #1 of the U.S. Bankruptcy Court, Robert N.C. Nix Building, 900 Market Street, Philadelphia, PA 19107-4299.**
4. **If you do not file a response to the Motion,** the court may cancel the hearing and enter an order granting the relief requested in the Motion.
5. You may contact the Bankruptcy Clerk's office at 215-408-2800 and for Reading cases at 610-208-5040 to find out whether the hearing has been cancelled because no one filed an answer.
6. If a copy of the motion is not enclosed, a copy of the Motion will be provided to you if you request a copy from the attorney whose name and address is listed on the next page of this notice.

**Filing Instructions**

7. **If you are required to file documents electronically by Local Bankruptcy Rule 5005-1**, you must file your response electronically.
8. **If you are not required to file electronically**, you must file your response at the Clerk's Office, U.S. Bankruptcy Court, Robert N.C. Nix Bldg., 900 Market Street, Suite 400, Philadelphia, PA 19107.
9. **If you mail your response** to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated in Paragraph 2 on the previous page of this Notice.
10. On the same day that you file or mail your Response to the Motion, you must mail or deliver a copy of the Response to the movant's attorney:

Jeffrey C. McCullough, Esquire  
Bond & McCullough  
16 N. Franklin St., Suite 300  
Doylestown, PA 18901  
215-348-8133  
215-348-0428 – Fax  
[jeffmccullough@bondmccullough.com](mailto:jeffmccullough@bondmccullough.com)

Dated: March 23, 2021